

EXHIBIT 6

Pursuant to Local Rule 5.3(A), exhibits attached hereto have been redacted to protect the personal privacy of individuals, including dates of birth and social security numbers.

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES ROBINSON,)
v. Plaintiff,) Civil Action No. 04-11964-NG
TELESECTOR RESOURCES GROUP, INC. D/B/A)
VERIZON SERVICES GROUP,)
Defendant.)

)

AFFIDAVIT OF PATRICK PODOLSKA

I, Patrick Podolske, hereby depose and say as follows:

1. I was born on 1960.
2. I am currently employed by Verizon Communications Inc. From April 2000 until August 2001 I worked as a Team Leader with Charles Robinson in Verizon's National Markets Center – Complex Services Department center located at 6 Bowdoin Square, Boston, Massachusetts (the "NMC"). At that time I reported to second-level manager Hank Pilat.
3. Throughout 2000 and 2001, I regularly heard comments from Team Leaders and other employees regarding the merger of Bell Atlantic and GTE that formed Verizon and possible layoffs and separation packages. On several occasions I heard Plaintiff discuss those rumors.
4. On several occasions I heard Mr. Robinson respond to employees asking questions of him "Pretend I am not here - what would you do?" On a number of occasions Mr. Robinson's employees approached me for answers after failing to receive sufficient guidance from Mr. Robinson.

Redacted

5. On several occasions after Mr. Robinson transferred to the NMC, Mr. Robinson sat with me in order for me to assist Mr. Robinson in better understanding the various Service Order Provisioning ("SOP") systems used by service representatives in the NMC. On those occasions, Mr. Robinson observed me answering questions posed by service representatives. However, Mr. Robinson showed little interest in learning these systems.

6. I observed in Mr. Robinson's cubicle a cartoon showing a unicorn and other animals, with handwritten captions associating each of the animals with specific NMC members, including myself. Mr. Robinson never said anything to me that suggested that he was upset or offended by that cartoon or that the cartoon referred in any way to his age. Rather, Mr. Robinson made an enlarged color copy of part of the cartoon and gave it to me.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 20th DAY
OF OCTOBER, 2005.


Patrick Podolske